

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jamal Daniel Champele

Case No. Case: 2:22-mj-30231

Assigned To : Unassigned

Assign. Date : 5/17/2022

USA V. CHAMPELE (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2022 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 17, 2022

City and state: Detroit, MI



Complainant's signature

Brett J. Brandon, Special Agent, ATF

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances

described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning JAMAL DANIEL CHAMPELE. (B/M; DOB: XX/XX/1995) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), among other state and federal criminal violations.

PROBABLE CAUSE
CRIMINAL HISTORY

4. On February 25, 2016, CHAMPELE pled guilty in Michigan Sixth Circuit Court to felony Home Invasion – 1st Degree. On March 10, 2016, CHAMPELE was sentenced to a term of probation pursuant to the Holmes Youthful Trainee Act (HYTA). On April 17, 2019, HYTA was revoked and CHAMPELE was sentenced to twenty-five months – twenty years in prison.

FEDERAL SEARCH WARRANT

5. On May 13, 2022, I swore to and obtained a sealed federal search warrant for 346 N. Cass Avenue in Pontiac, Michigan.

6. On May 16, 2022, the ATF and OCSO served a sealed federal search warrant for 346 N. Cass Avenue in Pontiac, Michigan.

7. During the entry, LORENTE WASHINGTON, also a convicted felon, tried to flee out of the side door, but encountered an ATF Task Force Officer covering the side door and retreated into the residence shortly after opening the door. The entry team eventually encountered WASHINGTON, wearing a white t-shirt, gray sweatpants, and blue socks, laying on the couch in the living room.

8. The entry team encountered CHAMPELE in the first floor north bedroom suffering from a recent MCL tear and had to carry him out of the residence.

9. The ATF recovered the following items from the living room:

- a. One black Beretta APX 9mm pistol bearing serial number “A119883X” loaded with one round in the chamber and fifteen rounds in the extended magazine inserted in the firearm. Located and recovered from the end table along the east wall in the living room, directly next to the couch the entry team encountered WASHINGTON laying on.
- b. One brown wood and metal Zastava model N-PAPDF 7.62 caliber rifle bearing serial number “NPDF012965” loaded with one round in the chamber and thirty rounds in the

magazine inserted in the firearm. Located and recovered from the living room closet along the north wall.

- c. One black American Tactical OMNI -Hybrid multi-caliber AR pistol bearing serial number “NS269305” loaded with one round of .223 caliber ammunition in the chamber and thirty rounds of .223 caliber ammunition in the magazine inserted in the firearm. Located and recovered from the living room closet along the north wall.
- d. One Michigan 52-1 District Court Bench Warrant in the name CHAMPELE. Located and recovered from the entertainment center in the living room within close proximity to the closet.

10. The ATF recovered the following items from the Dodge Durango parked in the backyard of the residence.

- a. One black and tan ROMARM SA-CUGIR SAR-1 7.62 caliber rifle bearing serial number “S1-86906-03” loaded with one round in the chamber and numerous rounds in two thirty round magazines duct tapped together and inserted in the firearm. Located and recovered from the

front passenger floorboard of the Dodge Durango parked in the backyard.

- b. One gray Black Rain Ordinance SPEC15 multi-caliber rifle bearing serial number “SM031551” loaded with one round of 7.62 caliber ammunition in the chamber and thirty-one rounds of 7.62 caliber ammunition in the magazine inserted in the firearm. Located and from the front passenger floorboard of the Dodge Durango parked in the backyard.
- c. One black Master Piece Arms 9mm pistol bearing serial number “FJ01077” with an empty extended magazine inserted. Located and recovered by Special Agent Weston from the front passenger floorboard of the Dodge Durango parked in the backyard.
- d. A State of Michigan Department of Labor and Unemployment and Economic Opportunity Unemployment Insurance Agency envelope addressed to CHAMPELE at 346 N. Cass Avenue in Pontiac, Michigan.

11. The ATF also recovered hundreds of rounds of ammunition from the residence.

12. On May 16, 2022, I contacted ATF Interstate Nexus Expert, Special Agent Jimmie Pharr and provided a verbal description of the above-referenced firearms. Based upon the verbal descriptions, Special Agent Pharr advised the firearms are firearms as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

13. During the search warrant service, CHAMPELE was utilizing a cell phone while in handcuffs on the front porch. For officer safety, ATF seized the phone from CHAMPELE and I planned to secure the phone for the remainder of the search while I processed evidence. Upon receiving the phone, which was unlocked and open to the Facebook application. I observed several thumbnail images, to include a thumbnail of a five second video of what appeared to be the black and tan ROMARM SA-CUGIR SAR-1 7.62 caliber rifle and the black American Tactical OMNI -Hybrid multi-caliber AR pistol on the kitchen table inside 346 N. Cass Avenue as well as several thumbnail images of CHAMPELE. As I attempted to place the device in airplane mode, I

accidentally clicked the video open which revealed the black Beretta APX 9mm pistol and one gray Black Rain Ordinance SPEC15 multi-caliber rifle on the kitchen table with the other firearms. The camera then pans to the right and shows a black male (below the neck) wearing a white t-shirt, gray sweatpants, blue socks holding the brown wood and metal Zastava N-PAPDF 7.62 caliber rifle. Based upon my interactions with WASHINGTON during the search warrant and subsequent interview, WASHINGTON's clothing appeared to be consistent with the black male's holding the Zastava N-PAPDF 7.62 caliber rifle.

POST-MIRANDA INTERVIEW

14. On May 16, 2022 at approximately 12:00 pm, OCSO Detective (Det.) Bader, Special Agent Weston, and I conducted an video and audio recorded post-Miranda interview of CHAMPELE at the OCSO Pontiac Substation. I read aloud the "Rights" portion of the ATF Advice of Rights and Waiver (ATF Form 3200.4) and WASHINGTON read aloud the "Waiver" portion. WASHINGTON signed and date the form, acknowledged he understood his rights, voluntarily agreed to

waive his rights, and in response to questioning, stated in summary and not verbatim, as follows:

15. CHAMPELE admitted to being a convicted felon recently paroled after doing over three years in prison for Home Invasion;

16. CHAMPELE admitted to sleeping at the residence the night before the search warrant service;

17. CHAMPELE admitted to taking the video on his phone of the firearms in the kitchen of the residence.

CONCLUSION

18. Based upon the aforementioned facts stated herein, there is probable cause to believe JAMAL DANIEL CHAMPELE (B/M; DOB: XX/XX/1995), a convicted felon aware of his felony conviction, did knowingly and intentionally possess a black and tan ROMARM SA-CUGIR SAR-1 7.62 caliber rifle, a black American Tactical OMNI - Hybrid multi-caliber AR pistol, a black Beretta APX 9mm pistol, black Master Piece Arms 9mm pistol bearing serial number, and a gray Black Rain Ordinance SPEC15 multi-caliber rifle, in violation of 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm. Said violation occurring

on or about May 16, 2022, in the city of Pontiac, in the County of Oakland, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: May 17, 2022